



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Head Start 4th Floor – Switzer Memorial Building, 330 C Street SW, Washington DC 20024 [eclkc.ohs.acf.hhs.gov](http://eclkc.ohs.acf.hhs.gov)

## Program Performance Summary Report

**To: Board Chairperson**

*Ms. Jenine Dunn*

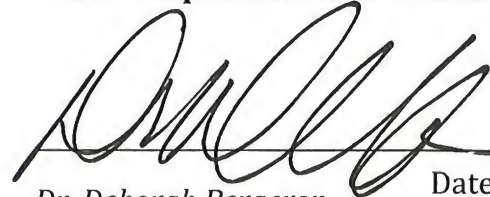
*Board Chairperson*

*Community Action Organization of Erie County, Inc.*

*45 Jewett Avenue, Ste.150*

*Buffalo, NY 14214*

**From: Responsible HHS Official**

 8/14/18

*Dr. Deborah Bergeron*

Date

*Director, Office of Head Start*

From April 23-27, 2018, the Administration for Children and Families (ACF) conducted a Focus Area Two Monitoring Review of the Community Action Organization of Erie County, Inc. Head Start and Early Head Start programs. This report contains information about the grantee's performance and compliance with the requirements of the Head Start Program Performance Standards or Public Law 110-134, *Improving Head Start for School Readiness Act of 2007*. We would like to thank your governing body, policy council, parents, and staff for their engagement in the review process.

Based on the information gathered during this review, your program was found to need improvement in one or more areas. The report provides you with detailed information in each area where program performance did not meet one or more applicable Head Start Program Performance Standards, laws, regulations and policy requirements and the required timeframes for corrective action.

Please contact your Regional Office for guidance should you have any questions or concerns. Your Regional Office will follow up on the content of this report and can work with you to identify resources to support your program's continuous improvement.

## DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following recipients:

Ms. Carolyn Baker, Regional Program Manager

Ms. Ashley Perkins, Policy Council Chairperson

Mr. L. Nathan Hare, CEO/Executive Director

Ms. Phyllis McBride, Head Start Director (02CH010329, 02CH10048)

Ms. Diane Semrau, Early Head Start Director (02CH010329, 02CH10048)

Ms. Kelly Fanara, Early Head Start Director (02HP0020)

## STRUCTURE OF THE REPORT

This report provides grantees with an overview of program performance based on information collected during the Focus Area Two Monitoring Review. The report contains the following three sections: Overall Performance Summary; Program Infrastructure, Oversight, and Improvement; and Service Delivery. The report also contains a Glossary of Terms, which can be found on page 3 of this report.

**Section I: Overall Performance Summary** provides a consolidated view of the status of your program's performance across the four components of Program Infrastructure, Oversight and Improvement areas and the three Service Delivery areas. This section includes a Summary of Findings table, where applicable, to indicate any areas of concern, areas of noncompliance or deficiencies identified during the review.

**Section II: Program Infrastructure, Oversight, and Improvement** provide information on the effectiveness of your program's management systems, practices, and infrastructure. This section of the report focuses on four areas of performance, described as follows:

1. **Program Management** includes an assessment of the program's overall management structure, its system of ongoing compliance oversight and continuous improvement, and its system for hiring, supervising, and developing qualified staff.
2. **Program Governance** includes assessment of the governing body and policy council's active involvement in fulfilling their respective roles and responsibilities and effective oversight of the program.
3. **Financial Management** describes outcomes of the assessment of the grantee's internal controls, financial management systems, fiscal capacity, and practices.
4. **Enrollment, Recruitment, Selection, Eligibility, and Attendance (ERSEA)** indicates program performance in tracking and using attendance data to assist families and staff in supporting and managing attendance issues, and in monitoring compliance with eligibility requirements.

**Section III: Service Delivery** provides information on your program's performance in delivering quality services to children and families within the following three areas:

1. **Early Education and Child Development Program Services** include outcomes of the assessment of your program's teaching practices and learning environments, services for children with disabilities and their families, and, where applicable, the delivery of home-based services.
2. **Health Program Services** focus on the assessment of health, mental health, oral health, and nutritional services for children and families, services provided to enrolled pregnant women (where applicable), and the health and safety of the grantee's environments.
3. **Family and Community Engagement Program Services** describe the assessment outcomes of your program's family engagement and support strategies, including the integration of family engagement into all services to support family well-being and promote school readiness.



Glossary of Terms	
<b>Area of Concern</b>	An area for which the agency needs to improve performance. These issues should be discussed with the grantee's Regional Office of Head Start for possible technical assistance.
<b>Area of Noncompliance</b>	An area for which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more area of performance. This status requires a written timeline of correction and possible technical assistance or guidance from the grantee's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
<b>Deficiency</b>	<p>As defined in the Head Start Act, the term "deficiency" means:</p> <p>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</p> <ul style="list-style-type: none"> <li>(i) a threat to the health, safety, or civil rights of children or staff;</li> <li>(ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;</li> <li>(iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;</li> <li>(iv) the misuse of funds received under this subchapter;</li> <li>(v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or</li> <li>(vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified;</li> </ul> <p>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</p> <p>(C) an unresolved area of noncompliance.</p>

## Grantee Information

**Head Start Enrollment:** 2183

02CH010329 – 1983; 02CH10048 – 200

**Early Head Start Enrollment:** 535

02CH010329 – 205; 02CH10048 – 140;

02HP0020 – 190

**Number of Grants:** 3

**Head Start Director:** Ms. Phyllis McBride (02CH010329, 02CH10048)

**Early Head Start Director:**

Ms. Diane Semrau (02CH010329, 02CH10048)

Ms. Kelly Fanara (02HP0020)

**Board Chairperson:** Ms. Jenine Dunn

**Policy Council Chairperson:** Ms. Ashley Perkins

**Program Specialist:** Ms. Vanessa Nelson-Eastmond

**Fiscal Specialist:** Ms. Stefanie Gordon



Community Action Organization of  
Erie County, Inc.

## Section I. Overall Performance Summary

The summary table provides an overview of your program's performance in each of the seven core areas of performance subsumed within Program Infrastructure, Oversight, and Improvement and the Service Delivery sections of the report. *Performance Status* is interpreted as follows:

- ✔ Your program has met all requirements assessed within this performance area.
- ✘ Your program has an area of concern or an area of noncompliance in one or more requirements assessed within this performance area; your program has not met all requirements.
- ⏸ Your program has a deficiency in one or more requirements assessed within this area.

Program Performance: Program Infrastructure, Oversight, and Improvement			
Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Program Management	✘	✘	✘
Program Governance	✔	✔	✔
Financial Management	✔	✘	✔
ERSEA	✔	✔	✔
Program Performance: Service Delivery			
Education and Child Development Program Services	✘	✘	✘
Health Program Services	✔	✔	✔
Family and Community Engagement Program Services	✔	✔	✔



### Summary of Findings

Applicable Standards	Grant Number(s)	Timeframe	Compliance Level	Service Area
1302.91(e)(1)(2)(ii)	02CH010329, 02CH10048, 02HP0020	120 days	Area of Noncompliance	Program Management
75.306(i)(3)	02CH10048	Follow up with Regional Office for support	Area of Concern	Financial Management

## Section II: Program Infrastructure, Oversight and Improvement

This section of the report provides information on your program's performance in: (1) Program Management; (2) Program Governance; (3) Financial Management; and (4) ERSEA.

### 1. Program Management

This section describes your program's performance in providing management, ongoing monitoring and continuous improvement to achieve program goals and ensure child safety and the delivery of high-quality program services. This section indicates your program's performance in each of the following areas: program management structure; ongoing oversight and continuous improvement; and staff hiring, supervision, and development.

#### Program Management Performance Summary

Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Program management structure			
Ongoing oversight and continuous program improvement			
Staff hiring, supervision, and development			

#### Performance Area Summary




**Program management structure.** The monitoring review found your program maintains a program and human resource management structure that provides effective management of all program areas.

**Ongoing oversight and continuous program improvement.** The monitoring review found that your program effectively uses data for ongoing monitoring of its program's services and continuous program improvement.

**Staff hiring, supervision, and development.** The monitoring review assessed whether your program has implemented a systematic approach to staff hiring, supervision, training, support and professional development that supports high-quality

service delivery in accordance with the program performance standards, individual staff professional development, and continuous program improvement.

The review determined the following:

-  Your program has implemented an effective system of ongoing supervision that supports continuity of care for children and families, healthy and safe environments, and engagement of families in their children's learning and development.
-  Your program's Head Start and Early Head Start center-based teachers do not meet the required qualifications.
-  Some of your staff has not received the training and opportunities for professional development and support that they need to be able to ensure they are positioned to consistently provide quality services that meet the needs of your program's children and families. The need for additional training and professional development was an issue for your program's Education and Child Development staff.

*Area of Noncompliance 1302.91(e)(1)(2)(ii)*

*Timeframe for Correction: 120 days*

*1302.91 Staff qualifications and competency requirements. (e) Child and family services staff. (1) Early Head Start center-based teacher qualification requirements. As prescribed in section 645A(h) of the Act, a program must ensure center-based teachers that provide direct services to infants and toddlers in Early Head Start centers have a minimum of a Child Development Associate (CDA) credential or comparable credential, and have been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development. (2) Head Start center-based teacher qualification requirements (ii) As prescribed in section 648A(a)(3)(B) of the Act, a program must ensure all center-based teachers have at least an associate's or bachelor's degree in child development or early childhood education, equivalent coursework, or otherwise meet the requirements of section 648A(a)(3)(B) of the Act.*

(02CH010329, 02CH10048, 02HP0020)

The reviewers found that 7 out of 64 staff did not have the required qualifications as a lead teacher.

Grants 02CH10048 and 02CH010329 each had three teachers who did not meet the minimum qualifications. Grant 02HP0020 had one teacher who did not meet the minimum qualifications.

A review of the staff qualification tracking form found the Head Start teachers had a preschool Child Development Associate (CDA) credential, but according to the Program Director, staff was reluctant to continue their education beyond their CDA. The Early Head Start teacher for grant 02HP0020 had a high school diploma. Each staff person had a professional development plan; however, none indicated staff was enrolled in coursework to obtain the required qualifications.

The grantee did not ensure all Head Start and Early Head Start (EHS) center-based teachers had the minimum education qualifications and competency requirements; therefore, it was not in compliance with the regulation.

## 2. Program Governance

This section indicates your program's performance in each of the two *Program Governance* performance areas: governing body and policy council.



### Program Governance Performance Summary

Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Governing body	✓	✓	✓
Policy council	✓	✓	✓

#### Performance Area Summary

**Governing body.** The monitoring review found your program’s governing body uses data (e.g., ongoing monitoring, fiscal, school readiness, and other data such as audits, self-assessment, and monthly reports) and leverages its subject matter expertise to participate fully in the program oversight, planning, and monitoring, including annual approval of the operating budget and the safeguarding of funds.

**Policy council.** The monitoring review found your program’s policy council uses data and leverages its knowledge of the community effectively for ongoing monitoring, continuous improvement, and program oversight, including involvement in budget planning, policies for reimbursement, and participation in policy council activities.

### 3. Financial Management

This section describes your program’s performance in each of the seven performance areas listed under the Financial Management performance area.

### Financial Management Performance Summary

Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Internal controls	✓	✓	✓
Financial management system	✓	✓	✓
Identifying and mitigating risk	✓	✓	✓
Adequacy of budgeted resources	✓	✓	✓
Budget management	✓	X	✓
Automated accounting and record keeping system	✓	✓	✓
Delegate agency oversight	✓	✓	✓

#### Performance Area Summary

**Internal controls.** The monitoring review found your program has internal controls that provide effective oversight of all fiduciary areas of responsibility to ensure accomplishment of program objectives.

**Financial management system.** The monitoring review found your program has a financial management system and accounting and reporting practices that support ongoing fiscal operations, provide supporting documentation necessary to

facilitate effective audits, enable your program to remain in compliance with laws, regulations, grant terms and conditions, and ensure payment of allowable program expenses promptly and within the appropriate budget period.

*Identifying and mitigating risk.* The monitoring review found your program has a process to identify risks and obtain cost-effective insurance for those identified risks, including a system for ensuring the protection of Federal interest in real property purchased with Federal funds.

*Adequacy of budgeted resources.* The monitoring review found your program has sufficient staffing and resources to promote continuity of care for all children enrolled, allow for sufficient time needed for staff to participate in training and professional development, allow for provision of the full range of services, and ensure that facilities, equipment, and materials remain safe.

*Budget management.* The monitoring review assessed whether your program has a management system that effectively monitors its budget for personnel, compensation, benefits, shared cost, non-Federal share, and indirect and administrative costs.

The review determined the following:

- ✓ Your program has implemented effective procedures for determining allowability of costs.
- ✓ Your program has a cost allocation plan to assure that shared costs are properly allocated to the Head Start award in proportion to benefit.
- ✓ Your program's activities receive an appropriate allocation of indirect costs in accordance with the grantee's negotiated indirect cost rate agreement, adopted de Minimis rate, or cost allocation plan addressing indirect costs.
- ✓ Your program manages and monitors administrative and developmental costs to ensure it does not exceed the 15 percent limitation of total approved program costs.
- ✓ Your program has a qualified Fiscal Officer.
- ✗ Your program has not ensured that the value of donated property does not exceed the fair rental value of comparable space.

*Area of Concern 75.306(i)(3)*

*Follow up with Regional Office for support*

75.306 Cost sharing or matching. (i) The value of donated property must be determined in accordance with the usual accounting policies of the non-Federal entity, with the following qualifications: (3) The value of donated space must not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

(02CH10048)

The grantee did not ensure the value of donated space did not exceed the fair rental value of comparable space as established by an independent appraisal.

The grantee provided a spreadsheet in support of in-kind claimed for donated space at three locations, 9th Street, Newfane, and North Tonawanda. The column headings indicated the grantee used market cost instead of fair rental value for the determining allowable donated space costs, after deducting rent paid for each facility.



Head Start and Early Head Start staff responsible for determining the allowability of donated space stated county appraisal records were reviewed and not the services of an independent appraiser.


*Automated accounting and record keeping system.* The monitoring review found your program maintains an automated accounting and record keeping system adequate for effective oversight.

*Delegate agency oversight.* The monitoring review found your program is accountable for the services delegate agencies provide and ensures provision of high-quality services to children and families.

#### 4. ERSEA

The final performance area in Section I, ERSEA, focuses on your program's performance in eligibility, attendance, and enrollment.

##### ERSEA Performance Summary

Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Eligibility			
Attendance			
Enrollment			

##### Performance Area Summary

*Eligibility.* The monitoring review found your program enrolls children who are categorically eligible or who fall within defined income-eligibility requirements based on Head Start requirements.

*Attendance.* The monitoring review found your program monitors and uses attendance data to support families in promoting individual child attendance and to inform program improvements where monthly attendance rates indicate systematic attendance issues.

*Enrollment.* The monitoring review found your program monitors and maintains funded enrollment levels and fills any vacancy as soon as possible.

#### Section III. Service Delivery

This section of the report provides the results of the assessment of your program's service delivery, including your program's: (1) Education and Child Development Program Services; (2) Health Program Services; and (3) Family and Community Engagement Program Services.

Each summary table includes information from Section II's Program Management and Financial Management assessment to provide a comprehensive summary of the assessment of your program's service delivery. The summary table includes information on how well your program is providing ongoing oversight and continuous improvement; hiring, supervising, and developing staff; and budgeting adequate resources within the respective education, health, and family and community engagement service areas.

## 1. Education and Child Development Program Services

This section describes your program's performance in delivering the following services: teaching practices and learning environments, services for children with disabilities, and home-based program services (where applicable).

### Education and Child Development Services Performance Summary

Education and Child Development Service Delivery			
Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Teaching practices and learning environments	✓	✓	✓
Services for children with disabilities	✓	✓	✓
Home-based services	✓	✓	✓
Program Management*			
Program management structure	✓	✓	✓
Ongoing oversight and continuous improvement of education and child development services	✓	✓	✓
Hiring, supervision, and development of education and child development staff	X	X	X
Financial Management*			
Adequacy of resources for education and child development services	✓	✓	✓

\* Program and Financial Management data is only presented in this summary table; no narrative text is provided in the sections that follow. See Section II for narrative description of grantee *Program Management* and *Financial Management* performance.

#### Performance Area Summary

**Teaching practices and learning environments.** The monitoring review found your program uses a developmentally appropriate research-based curriculum that aligns with the HSELOF, your program has implemented effective teaching practices and well-organized learning environments that promote progress in children's development and growth.

**Services for children with disabilities.** The monitoring review found your program fully engages children with disabilities in all aspects of the program, engages families of children with disabilities in their children's learning and development, and supports families in becoming advocates for services that meet their children's needs.

**Home-based services.** The monitoring review found your home-based program provides home visits and group socialization activities that promote secure parent-child relationships and help parents provide high-quality early learning experiences for their children.



## 2. Health Program Services

This section indicates your program's performance in delivering the following Health Program services: addressing health status and health needs; oral health and nutrition services; mental health services; services for pregnant women; and maintaining healthy and safe environments.

### Health Program Services Performance Summary

Health Program Service Delivery			
Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Addressing health status and health needs	✓	✓	✓
Oral health and nutrition services	✓	✓	✓
Mental health services	✓	✓	✓
Services for pregnant women	✓	✓	✓
Healthy and safe environments	✓	✓	✓
Program Management*			
Program management structure	✓	✓	✓
Ongoing oversight and continuous improvement of health program services	✓	✓	✓
Hiring, supervising, and developing health program service staff	✓	✓	✓
Financial Management*			
Adequacy of resources for health program services	✓	✓	✓

\* Program and Financial Management data is only presented in this summary table; no narrative text is provided in the sections that follow. See Section II for narrative description of grantee Program Management and Financial Management performance.

### Performance Area Summary

**Addressing health status and health needs.** The monitoring review found your program effectively collects, tracks, addresses, and shares information regarding each child's health status and health needs, including health, mental health, oral health, and nutritional needs.

**Oral health and nutrition services.** The monitoring review found your program has a system for maintaining and monitoring for effective oral health practices and providing nutrition services that meet the nutritional needs of and accommodate the feeding requirements of each child.

**Mental health services.** The monitoring review found your program effectively utilizes mental health consultation to support staff, including home visitors, in identifying and meeting children's mental health and social and emotional needs.

*Services for pregnant women.* The monitoring review found your program provides and monitors for quality services for enrolled pregnant women to access through referrals, at a minimum, healthcare to provide them with information to support prenatal and post-partum care, maternal and infant health, and emotional well-being.

*Healthy and safe environments.* The monitoring review found your program has implemented a process for monitoring and maintaining healthy and safe environments.

### 3. Family and Community Engagement Program Services

This section indicates your program's performance in the following Family and Community Engagement Services: integrating family engagement into all systems and services; creating responsive program environments; and identifying family needs and making progress toward individual family outcomes.

#### Family and Community Engagement Services Performance Summary

Family and Community Engagement Service Delivery			
Performance Area	Performance Status 02CH010329	Performance Status 02CH10048	Performance Status 02HP0020
Integrating family engagement into all systems and services	✓	✓	✓
Creating responsive program environments	✓	✓	✓
Identifying family needs and making progress toward individual family outcomes	✓	✓	✓
Program Management*			
Program management structure	✓	✓	✓
Ongoing oversight and continuous improvement of family and community engagement services	✓	✓	✓
Hiring, supervising, and developing family and community engagement staff	✓	✓	✓
Financial Management*			
Adequacy of resources for family and community engagement services	✓	✓	✓

\* Program and Financial Management data is only presented in this summary table; no narrative text is provided in the sections that follow. See Section II for narrative description of grantee Program Management and Financial Management performance.

#### Performance Area Summary

*Integrating family engagement into all systems and services.* The monitoring review found your program integrates family engagement and support strategies into all systems and demonstrates progress in providing quality program services to support family well-being and promote school readiness.

*Creating responsive program environments.* The monitoring review found your program creates welcoming, culturally, and linguistically responsive program environments.



*Identifying family needs and making progress toward individual family outcomes.* The monitoring review found your program collaborates with parents to identify strengths and needs and make progress toward individual family outcomes.

*--- End of Report ---*